

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Francis G. Piller
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association, as Trustee for Igloo Series
IV Trust
v.

Francis G. Piller
Kenneth E. West
Respondents

CASE NO.: 25-11771-djb

CHAPTER 13

Judge: Derek J. Baker

Hearing Date:

Objection Deadline:

OBJECTION TO CONFIRMATION OF PLAN

PLEASE TAKE NOTICE that SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee for Igloo Series IV Trust (“Secured Creditor”), the holder of a mortgage on real property of the Debtor, located at 4334 1/2 Boone Street, Philadelphia, PA 19128, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor filed a Chapter 13 Plan on June 16, 2025.
2. Debtor’s Plan is insufficient to provide for the arrears claim of Secured Creditor.

The objecting creditor is due arrears of \$60,008.56 pursuant to Claim 1-1 filed on June 17, 2025, however the plan only provides for arrears in the amount of \$55,192.00.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), *et seq.* unless the plan provides for full payment of the claim.

Dated: June 24, 2025

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for SN Servicing Corporation as servicer
for U.S. Bank Trust National Association, as
Trustee for Igloo Series IV Trust
1325 Franklin Avenue, Suite 160

Garden City, NY 11530

T: (212) 471-5100

F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Francis G. Piller
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association, as Trustee for Igloo Series
IV Trust
v.

Francis G. Piller
Kenneth E. West
Respondents

CASE NO.: 25-11771-djb

CHAPTER 13

Judge: Derek J. Baker

Hearing Date:

Objection Deadline:

CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN

I certify under penalty of perjury that I caused to be served the above-captioned pleading on the parties at the addresses specified below or on the attached list on June 24, 2025.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail are listed under the heading "Service by First-Class Mail."

EXECUTED ON: June 24, 2025

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for SN Servicing Corporation as servicer
for U.S. Bank Trust National Association, as
Trustee for Igloo Series IV Trust
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

Service by Regular Mail

Francis G. Piller
4334 1/2 Boone St
Philadelphia, PA 19128-4901
Bankruptcy Debtor

Service by NEF

Kenneth E. West
190 N. Independence Mall West, Suite 701
Philadelphia, PA 19106
Bankruptcy Trustee

Michael A. Cibik
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
Attorney

United States Trustee
Robert N.C. Nix Federal Building
900 Market Street - Suite 320,
Philadelphia, PA 19107
United States Trustee